American Gas Association

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Docket ID No. EPA–HQ–OAR–2018–0853

March 14, 2019

Attn: Ms. Melissa Weitz
U.S. Environmental Protection Agency
Climate Change Division
Office of Air and Radiation
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: AGA Comments on EPA Draft 2019 Inventory of U.S. GHG Emissions and Sinks (1990-2017), Docket ID No. EPA–HQ–OAR–2018–0853

Dear Ms. Weitz:

The American Gas Association (AGA) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks (1990-2017) (2019 Draft GHGI). Our comments focus on the update to the emission factor for transmission pipeline blowdowns.

Update to Emission Factor for Estimating Emissions from Transmission Pipeline Blowdowns

In a November 27, 2018 letter to EPA, AGA commented on updates[1] EPA was considering for estimating transmission pipeline blowdowns in the 2019 EPA Inventory of U.S. Greenhouse Gas Emissions and Sinks (GHGI). At that time, EPA was considering updating the emission factor for transmission pipeline blowdowns based on data submitted for the 2016 reporting year under Subpart W of the GHG Reporting Program (GHGRP). In the AGA letter and a subsequent phone call, AGA identified issues with the EPA proposed emission factor for pipeline blowdowns because it included flawed data reported for 2016 by one company. The initial 2016 data from that company included an error, which was subsequently corrected by the reporting

[1] "Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2017: Other Updates Under Consideration," U.S. EPA (November 2018).

company. Thus, the current Subpart W dataset available to EPA corrects the erroneous data. AGA's letter also noted that 2017 reporting year data were also available and should be considered when developing a new emission factor. Ultimately, AGA recommended waiting an additional year to update the pipeline blowdown emission factor, because the emission factor using 2017 blowdown data was lower than the emission factor using 2016 data. A third year of data could potentially provide insight into whether one year was more representative than the other. For example, 2016 data may be atypical due to program maturity associated with the first year of reporting and/or a higher occurrence of blowdowns from construction / commissioning in 2016 that may not be representative of typical conditions.

In addition, it should be noted that companies are making concerted efforts to reduce blowdowns and blowdown emissions. This may lead to a downward trend over time.

In a February 12, 2019 Federal Register notice (84 Fed. Reg. 3444), EPA requested comment on the 2019 draft GHGI report, which updates the emission factor for transmission pipeline blowdowns using the average from corrected 2016 data and 2017 data. The notice also requests feedback on whether year-specific emission factors should be applied for 2016 and 2017, and whether the current emission factors should be applied for earlier years of the time series.

AGA appreciates EPA understanding the issue associated with the flawed 2016 data and revising the emission factor that was initially proposed. While AGA recommended waiting an additional year to integrate Subpart W data, we understand EPA's desire to proceed with the updated emission factor and applaud efforts to utilize Subpart W results to improve emission estimates for natural gas operations.

In response to EPA's request for feedback and because there are differences in 2016 and 2017 data, AGA recommends using event-specific emissions for 2016 and 2017, and applying the historical/previous emission factor for the earlier years in the time series. The resulting time series would show a one year increase in emissions in 2016 and similar emissions for other years. Alternatively, EPA could refrain from updating the emission factor in the 2019 inventory report, gather an additional year of Subpart W data, and update the transmission pipeline blowdown emission factor and emission estimates in the 2020 annual inventory report. The third year of Subpart W data (for 2018) could add insight regarding year-to-year variability and whether any data appears to be anomalous.

AGA remains concerned that the first reporting year (2016) may be lower quality data or an atypical year (e.g., more construction projects than representative of an average year), and requests that EPA continue to conduct an annual review of the pipeline blowdown emission factor that integrates additional Subpart W data for the most recent reporting year. For example, EPA should add the 2018 reporting year data when considering the appropriate transmission pipeline blowdown emission factor for the 2020 GHGI. The dataset that includes three years of Subpart W data should be carefully reviewed to consider not only average emissions from the cumulative dataset,

but also year to year emissions and emissions and counts by event type for each year. The objective should be developing an emission factor that reflects representative or typical conditions for transmission pipeline operations.

AGA offers its assistance in reviewing the data to help develop a high-quality emission factor.

AGA appreciates the opportunity to comment. If you have any questions, please do not hesitate to contact me or Tim Parr, AGA Senior Counsel, at tparr@aga.org.

Respectfully Submitted,

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